

Rhode Island UST ERP Development

MEETING MINUTES

MAY 20, 2003

UST Steering Committee

MEETING #4

May 20, 2003, 4:00 - 6:00 p.m.

RI Department of Environmental Management

Room 300

235 Promenade Street

Providence, RI 02908

Meeting began at approximately 4:05 pm.

IN ATTENDANCE

(see Attendance Sheet for Meeting #4, provided on the RI DEM UST ERP Webpage)

WELCOME

Ron Gagnon, RI DEM, Chief, Office of Technical and Customer Assistance

Ron gave a quick review of the previous meeting which focused on the ERP Certification process, including a quick overview of the “menu” approach being considered by the State of Tennessee. This approach, involving a list of responsibilities which may be distributed between the owner and operator, was discussed during the previous meeting. Ron informally polled the attendees and it appeared that many stakeholders recognized that this “menu” approach may be useful in the Rhode Island ERP program.

Ron discussed the need for training within the ERP program. With respect to training, it seems that all stakeholders recognize the importance of training. Ron expressed his position that the personnel responsible for completing the ERP checklists should understand the UST systems, the UST regulations, and the ERP process. Although the topic of mandatory training requirements was discussed at the end of the previous meeting and briefly during this meeting, some stakeholders were strongly against mandatory training - where the ERP program would be put in a position to “certify the certifier.” Following an informal polling of the stakeholders, it seems that the training initially available through the RI UST ERP program may be voluntary. Stakeholders recognize that the program may continue to change over time and, as necessary, training requirements may evolve. In the meanwhile, training and other types of ERP assistance will keep coming from DEM.

Some sections of the RI UST ERP workbook that were based on the Federal UST ERP workbook were distributed to the attendees. The sections had been modified by TechLaw to approximate the format used in the RI DEM Autobody ERP workbook and checklist. Many stakeholders did not have a chance to review the sections of the workbook prior to the meeting. Feedback from stakeholders who were familiar with the Federal UST ERP Workbook indicated a preference for the format of the original Federal workbook. One stakeholder did not like that some words and sentences had been moved by TechLaw. Several stakeholders stated a preference for having the questions within each section rather than broken-out into a separate booklet. One stakeholder mentioned that the font and format of the document may be better if was similar to other RI UST material that the facilities are accustomed to receiving.

Considerable discussion took place regarding how to present the questions. If included within the text of the book, RI DEM would be faced with receiving the entire book back from the facility. This could make it difficult to review the questions and extract information. It could create storage problems because of the large amount of paper that would be received. Further, if facilities were required to submit the entire workbook they would be losing a valuable reference tool. Including the questions in a separate workbook would save some of these problems. However, having the questions in a separate document could make it difficult for the facilities to keep track of which question is being answered and some errors could be introduced. A stakeholder brought up the possibility of using Mark Sense Recognition (MSR) forms (also known as “bubble sheets” or the technology used when filling out and scanning Lottery tickets). MSR could be used to alleviate some of these problems. A stakeholder asked if the ERP process could be done on-line (using the Internet) rather than through MSR or checklists/Forms. It was agreed that the program may eventually allow for this but it would not be a consideration for the immediate future.

The length of the workbook was discussed. One stakeholder mentioned that shortening the workbook would not necessarily add simplicity. The opposing point of view - that a long workbook would be difficult to follow and many facility representatives would lose interest if faced with a larger workbook - was also expressed. No consensus was reached regarding the length of the workbook. The stakeholders may have a better idea of the length requirements after becoming more familiar with the content of the workbook. This issues will be discussed during the next meeting.

Ron mentioned that the Autobody ERP program was voluntary but he would be happy if he received 50% response rate by the June 30th deadline.

A stakeholder mentioned that he still thought that if the workbook was too long and the ERP process was too complicated, too many people would lose interest and effectiveness of the program would be jeopardized.

A stakeholder mentioned that maybe insurance companies could be brought in as a motivating factor in the ERP certification process. The idea was that facilities could be encouraged and

maybe even trained to accurately conduct the ERP certification process by their insurance companies. Perhaps the insurance companies would become willing participants to reduce the number of accidents, leaks, spills, etc., at a facility. It was pointed out to the stakeholder that many/most facilities do not have liability insurance - the facilities rely on the LUST fund.

In order to conduct more substantive discussions about the content, structure, and length of the workbook during the next meeting (June 17, 2003), it was agreed that the most recent version of the workbook (Federal version modified to reflect RI UST regulations) would be posted on the RI DEM UST ERP Website. It was requested that stakeholders download, print, review, and comment on the sections of the workbook. If possible, they should be prepared to provide comments and/or marked-up versions of the workbook during the next meeting.

Meeting adjourned at 5:45.